



**WILLIAMS  
BROTHERS  
CONSTRUCTION, INC.**

**CODE OF BUSINESS ETHICS AND STANDARDS**

*Approved by the Board of Directors on May 21, 2021*

To the Williams Brothers Construction, Inc. Team:

One of the most important factors in WBCI's success over the past forty-seven years has been our strong reputation built by our great team. This has been accomplished by our commitment to building a quality product in a safe, fair, and ethical manner in full compliance with laws and regulations.

It is more important than ever that we maintain WBCI's reputation. The importance of conducting business with a strong sense of ethics and fairness is paramount to our continued success.

We understand, however, that construction is a complicated and heavily regulated industry, and that even with the best intentions, the proper course of action may not always be clear. Therefore, as a guide for our employees, vendors and partners on how we conduct our business dealings, WBCI has adopted this Code of Business Ethics and Standards (the "Code"). While it is impractical to set specific rules and regulations to cover every situation that we encounter, the Code is here to offer direction to aid employees in some of the most ethically challenging areas in our line of business.

We are all accountable for upholding and abiding by the Code. It applies equally to all employees, directors and officers of WBCI. So, please read these policies carefully and incorporate them into your everyday life at WBCI. These policies should be reflected in everything we do. We will be providing everyone with periodic training to ensure understanding and compliance with this Code.

WBCI supports the open discussion of these policies. If you have any questions, please consult your supervisor or myself.

David Williams  
President

RECEIPT FOR WBCI'S CODE OF BUSINESS ETHICS AND STANDARDS

Employee \_\_\_\_\_ Dated; \_\_\_\_\_

Print Name: \_\_\_\_\_

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If you have any questions regarding the policies contained in this booklet, please contact Joseph Williams, Vice-President, Operations.

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WBCI strives at all times to conduct its business in strict compliance with applicable laws, rules and regulations as well as the highest moral, ethical and professional standards.

Consistent with these standards, WBCI has adopted the following commitments to:

Emphasize honesty, fairness, confidentiality and a sense of responsibility to our subcontractors and suppliers that will enable us to be a good contractor, and understand and meet the expectations of our clients as well as the architects, engineers and other professionals with whom we work.

Treat employees fairly, implementing employment practices and programs related to compensation, education, training, recreation, and health on the basis of equal opportunity for all employees. Provide safe and healthy working conditions and maintain formal programs intended to prevent work-related injuries and accidents. Protect each other's privacy and conduct ourselves with the dignity and respect due all human beings.

Demonstrate a commitment to corporate citizenship in the many communities in which we reside and work and to society as a whole.

The purpose of WBCI's Code of Business Ethics and Standards is to provide general guidance on ethical and legal issues you may encounter relating to WBCI's business interests either on or off the job. The information here addresses two broad areas:

1. Conducting WBCI's business; and
2. Your obligation to report violations of this policy.

If you encounter circumstances that call for an interpretation or examination of WBCI policy or any of the issues discussed in this document, consult your supervisor or WBCI's Compliance Officer, Jacqueline Smith, to report suspected illegal or unethical conduct and an explanation of the consequences of this conduct is provided in the last section of this Code of Business Ethics and Standards.

## II. CONDUCTING WBCI'S BUSINESS

### 1. CONFIDENTIALITY STANDARDS

The protection of confidential information and trade secrets is vital to the interest and the success of WBCI. Confidential information about WBCI, its employees, clients, suppliers, and vendors is to be kept confidential and divulged only to individuals within the Company with both a need to receive and authorization to receive the information. If in doubt as to whether information should be divulged, err in favor of not divulging information and discuss the situation with your supervisor. No one may sell, transfer, disclose, display or otherwise make confidential information or trade secrets available to anyone outside the Company without the prior written approval of WBCI's Vice-President, Operations, however, such information may be used, if necessary, for the performance of your job, and then on a need-to-know basis, and may be disclosed if required by law. WBCI's Vice-President, Operations should be immediately notified if you learn or believe that confidential information or trade secret information has been released or is about to be released under circumstances when it is not authorized to be released.

All paper and electronic records and files maintained by WBCI are confidential and remain the property of the Company. Confidential information includes, but is in no way limited to the following:

- » Financial records and information;
- » Procurement and operating procedures;
- » Client preferences;
- » New product announcements;
- » Technology, formulas, inventions, and processes;
- » Business, marketing, and strategic plans and projections;
- » Personnel, payroll records and compensation data regarding current and former employees;
- » The identity of, contact information for, and any other information on current, past or prospective clients, their procurement personnel, procurement policies, requirements and preferences; and
- » Any other documents or information regarding the Company's operations, procedures, or practices.

Except in performing your work at WBCI, confidential information may not be removed from WBCI premises without express authorization. Confidential information obtained during or through employment with the Company may not be used by any employee for the purpose of furthering current or future outside employment or activities for obtaining personal gain or profit. Upon termination of employment at WBCI for any reason, an employee must promptly return to his or her department head or supervisor all Company documents and materials in the employee's possession, which contain any confidential information. WBCI reserves the right to avail itself of all legal and equitable remedies to prevent impermissible use of confidential information or to recover damages incurred as a result of the impermissible use of confidential information.

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## **2. CONFLICTS OF INTEREST**

Fulfillment of WBCI's commitments requires that the interests of the Company and its clients come first. A business conflict is anything that could affect or create the appearance of affecting an employee's judgment in fulfilling his or her responsibilities to WBCI. Potential conflicts of interest may create doubt on the part of clients, subcontractors, suppliers or employees and, accordingly, must be avoided. Examples of actual or potential conflicts of interest include the following:

- » Ownership of, or any other interest in, a firm that has done or desires to do business with WBCI;
- » Acceptance of payments or services from those seeking to do business with WBCI; and
- » Placement of business with a firm that will result in a direct economic benefit to an employee or any member of his or her family

The appearance of a conflict of interest must also be avoided. Any employee who feels that he or she may have an actual or potential conflict of interest should report all pertinent details to WBCI's Compliance Officer.

## **3. ANTITRUST POLICY**

WBCI's success in the construction industry depends on its commitment to the integrity of the procurement process in bidding, negotiating and performing contracts for its public and private customers. WBCI competes fairly and ethically in all of its business opportunities.

It is WBCI's policy that all employees, officers, members, managers and directors must comply with all antitrust/competition laws of the United States. As part of this policy, communication, directly or indirectly, by employees, officers, members, managers, and directors with any competitor regarding the present or contemplated business activities of WBCI or any of its competitors is strictly prohibited. It is absolutely forbidden for anyone to discuss bidding or pricing decisions, business plans, procedures or policies with a WBCI competitor or subcontractor.

## **4. POLITICAL CONTRIBUTIONS AND ACTIVITIES**

WBCI encourages its employees and officers to become involved in civic affairs and to participate in political activities. Employees and officers must recognize, however, that their involvement and participation must be on an individual basis, on their own time, and at their own expense. WBCI does not make political contributions and employees and officers are prohibited from making a donation to a political contribution on behalf of or in the name of WBCI. This includes contributions both directly to a candidate or office holder or a committee established to promote the candidacy of the officeholder or candidate.

WBCI does not use lobbyists in its dealings with government agencies or officials. Officers and employees who engage in political activities must do so on their own time and use their own resources as private citizens and not as WBCI representatives.

Further, when an employee speaks on public issues, it must be made clear that comments or statements made are those of the individual and not of WBCI.

## **5. PROTECTION OF COMPANY ASSETS AND INFORMATION**

Employees are required to protect WBCI's assets. These assets include, but are not limited to, all information, passwords to access automated information/computer systems, computer hardware, computer software, reports, records, analyses, plans, drawings, and official papers. WBCI retains the exclusive right of ownership of all company assets in any form or state, and designates management representatives as the guardians of those assets in order to ensure information reliability, accuracy, integrity, and confidentiality, as appropriate. WBCI designates individual managers and employees as custodians responsible for company information control and protection. Any use of WBCI's assets for any reason other than company related business is prohibited.

Officers and employees are prohibited from making false or misleading entries on WBCI documentation and from failing to maintain accurate records of business transactions, disposition of Company assets and payments received or made on behalf of WBCI.

## 6. GIFTS, GRATUITIES AND ENTERTAINMENT

No gifts, gratuities or other things of value may be given to any government employee who is involved in a procurement in which WBCI is interested, either as a prime, a joint venture member, or a subcontractor.

Prohibited gifts and gratuities can include minor items such as lunches, drinks, special discounts on items for the government employee's personal use or any other item of value. Generally, there is an exemption for unsolicited items, other than money, having a market value of \$20 or less per gift, with a \$50 annual aggregate maximum for the Company.

Employees and officers should be aware that even the appearance of wrongdoing could create an environment that casts doubt upon an otherwise legitimate business enterprise. As such, if there is any doubt as to whether an item qualifies as a gift, gratuity or other item of value, contact WBCI's Compliance Officer prior to giving such an item to a government employee.

No employee may accept a gift for attendance to a major entertainment functions (*e.g.*, golf or hunting trips) unless the officer or employee or WBCI either pays the full cost thereof or, within twelve months of the function, substantially reciprocates with an activity of comparable value. For example, a golf outing could be reciprocated with sporting event tickets. Employees and officers should review the details of major functions with the WBCI's Vice-President, Operations, prior to participation, including discussion of reciprocal activities.

It is the personal responsibility of every employee to ensure that his or her acceptance of such token gifts, meals, refreshments, or entertainment is proper and could not reasonably be construed as an attempt by the offering party to secure favorable treatment. If the gift could be construed as an attempt to secure favorable treatment, the employee must decline the gift and notify WBCI's Compliance Officer. Should circumstances arise where gifts or other items of value are received and cannot be returned, such gifts or other items of value shall be given to the Regional Executive Officer or Human Resources for disposition to a charitable organization.

When WBCI contracts with government entities, more restrictive rules regarding gifts, entertainment and business courtesies often apply, and rules can vary by state or municipality.

In addition, employees of federal, state or local governments, as well as employees of quasi-governmental entities are very often subject to strict regulations regarding the offering of gifts, meals, refreshments or entertainment in connection with business discussions.

## 7. STOCK OWNERSHIP

In order to avoid a conflict of interest, WBCI officers or employees should not purchase



or retain ownership of stock in any privately owned firm or a material percentage of stock in any public firm that is a subcontractor or supplier or has another contractual or business relationship with WBCI unless the officers or employee has disclosed such interest to the Company and the Company has agreed the ownership interest poses no conflict of interest. Employees and officers are required to disclose to WBCI's Compliance Officer any financial interest in companies they are negotiating or working with in the course of their employment.

Federal securities laws restrict or prohibit persons who receive material, nonpublic information as a result of a business relationship with a public company from trading in that company's stock. Such material, non-public information may include information obtained directly from the company as well as information that is obtained indirectly, such as by rumors, gossip and the like. Employees and officers should keep all such information confidential and employees who become substantially involved in a project that WBCI is building for a publicly traded company should not trade in the stock of the public company while WBCI is involved in any aspect of the project. If you already own stock in the public company and then become substantially involved in the project, you may sell the stock immediately, or hold it until the project is complete, but you should get independent legal advice regarding what you should do.

## **8. COPYRIGHT/PATENT AGREEMENT**

While employed by the Company, employees assign to WBCI all rights and interests in copyrights and/or patents concerning work performed during the course of employment with WBCI or in any way connected with or relating to duties performed on behalf of WBCI. In addition, at WBCI's request, employees must secure a patent and/or copyright at WBCI's expense and assign all rights and interests in the copyright and/or patent to WBCI.

## **9. COPYRIGHT COMPLIANCE**

It is WBCI's policy that all officers and employees respect the rights of intellectual property owners by complying with United States copyright law. Accordingly, do not alter or remove any copyright information about (i) the title or other information identifying the work; (ii) the name or other information about the author/owner of the work; (iii) terms and conditions of use of the work; or (iv) a copyright notice. When using the Internet, copyright law applies. Therefore, officers and employees should not copy or distribute copyrighted material (*e.g.*, books, magazines, manuals, articles, software, database files, documentation, articles, graphics files, and downloaded information) through the e-mail system, photocopy machines or by any other means unless the employee has confirmed in advance from appropriate sources that WBCI has the right to copy or distribute the material. While limited copying is permitted in certain instances, when among other things, the copying does not diminish the potential market for or value of the copyrighted work, these rules can be complex. Failure to observe a copyright may result in disciplinary action by WBCI as well as legal action by the copyright owner.

## 10. PUBLIC PROCUREMENT INTEGRITY

The following policy is designed to implement State and Federal laws and regulations that prohibit various activities during the procurement process and are designed to eliminate the release of “insider” or confidential information during the procurement process. The penalties for failure to comply can be severe, and may include stiff civil monetary penalties, termination of the contract, refund of profits, and criminal penalties. Accordingly, this policy should be read with care and strictly followed.

### *Timing and Applicability*

This policy applies to ALL public procurements in which WBCI is a competitor, regardless of whether WBCI is competing as a prime contractor, as a member of a joint venture or as a subcontractor. It also applies to the modification and extension of existing federal, state, or local contracts and subcontracts.

### *Prohibited Conduct*

During the conduct of a public procurement (which commences upon the development of a solicitation from the public body), WBCI employees and officers may not, directly or indirectly:

- » Make an offer or promise of future employment or business opportunity, or engage in discussions concerning future employment or business opportunities, with a procurement official.
- » Offer, give or promise to a procurement official any money, gratuity or other thing of value.
- » Solicit or obtain, prior to contract award, any proprietary or source selection information from any officer or employee of the subject agency.
- » Disclose proprietary or source selection information to any person other than an individual authorized by the contracting officer to receive such information.
- » Contract with a subcontractor or supplier specified by an employee or official acting for a public body as a condition of acceptance of WBCI’s bid.

### *Employment Discussions*

No discussions of any nature whatsoever concerning future employment or business arrangements (including consulting agreements) should be held between WBCI employees or officers and any government employee, government contract employee or government consultant substantially involved in a public procurement in which WBCI is interested, either as a prime, a joint venture member or a subcontractor. This prohibition begins at the inception of any procurement activities for a procurement in which WBCI is reasonably likely to be a competitor (e.g., development of the specifications, issuance of a request for information, or other activities undertaken in preparation for the conduct of procurement and

continues through award of the contract).

The prohibition applies to all government officers or employees who are involved in the procurement, and includes, but is not limited to, the contracting officer, the contracting specialist, any technical representatives, all members of any evaluating or source selection panels, the procuring authority, all persons involved in drafting the specifications or other solicitation provisions, and all subordinate persons acting at the direction of any of the persons named above.

Joseph Williams, WBCI Vice-President, Operations, should be contacted regarding applicability of this provision prior to talking with the government employees involved.

**Lobbying Procurement Contracts:** Illinois Executive Order No. 1 (2007) prohibits contractors and subcontractors from hiring the Governor or his/her family members to lobby procurement activities of the State for contracts that are over \$25,000.00 and in addition prohibits the hiring of a former State employee for lobbying purposes who had procurement authority for the one-year period preceding the procurement lobbying activity. Contractors and subcontractors, including bidders, must certify that they have and will comply with this Executive Order. Section 50-38 of the Illinois Procurement Code [30 ILCS 500/50-38] imposes certain lobbying restrictions on bidders and contractors, including causing the State to pay for any lobbyist costs, fees or other remuneration. WBCI's policy is to strictly comply with this Executive Order and Procurement Code provision.

## 11. Proprietary and Source Selection Information

WBCI employees should not, during the procurement process, solicit or obtain any proprietary or source selection information from any government employee.

“Proprietary” information includes the following:

- » Information contained in a bid or proposal of an offeror, other than WBCI.
- » Cost or pricing data of an offeror other than WBCI.
- » Any other information submitted to the government and designated as proprietary by an offeror other than WBCI.

Source selection information includes all information, (1) the disclosure of which would jeopardize the integrity of the procurement, and (2) which is required to be stored in such a manner to prevent disclosure.

The following are examples of source selection information:

- » Listings of offers and prices;
- » Listings of bidders and/or prices prior to opening;
- » Source selection plans;
- » Technical evaluation plans;
- » Technical evaluations of competing proposals;

- » Cost or price evaluations of proposals;
- » Competitive range determinations;
- » Rankings;
- » Source selection board reports and evaluations; and
- » Other information marked as source selection information.

Most of the items included above are examples of source selection information pertain to negotiated procurements. In general, a negotiated procurement involves a Request for Proposals from a public body, whether offered by the federal government or through a state. After proposals are received, the public body then negotiates with all of the qualified offerors. By their nature, negotiated procurements contain more opportunity for the improper disclosure of information than an Invitation for Bids (“IFB”) procurement.

IFBs involve the submission of sealed bids. There is no negotiation and award made to the lowest responsible and responsive bidder. Nonetheless, care must be taken to avoid soliciting or obtaining source selection information in IFB procurements. In an IFB, particular attention should be given to the receipt of information relating to a competitor’s bid prior to bid opening.

If proprietary or source selection information is received by an employee without soliciting such information (*e.g.*, anonymously, or through inadvertence) such information should not be used or disclosed further (See the discussion below on disclosure of proprietary or source selection information). The employee’s supervisor and WBCI’s Compliance Officer should be contacted and such information should be delivered to the contracting officer along with an explanation of the circumstances under which it came into WBCI’s possession.

## 12. FALSE CLAIMS ACTS

WBCI and its officers and employees must also take care to always make truthful statements in filings for projects funded in whole or in part by public dollars, whether directly or indirectly by grants, loans or otherwise. State and federal False Claims Acts prohibit not only the intentional submission of a false claim, but also claims that are submitted with deliberate ignorance or reckless disregard for the falsity of the claim. Both the individual officer or employee who submits a false claim and WBCI may be subject to criminal and civil penalties.

A public works contract may require WBCI and subcontractor to certify that any claim for additional compensation is made in good faith, is truthful and accurate and is in accordance with the terms and conditions of the contract. WBCI may also be required to certify that any subcontractor claim has been reviewed by the WBCI and that WBCI has no reason to believe and does not believe that the subcontractor's claim is false. Great care must be taken to ensure that these types of certification are truthful and made only after appropriate review of the documentation.

One can also violate a False Claims Act when one "causes" another party to submit a false or fraudulent claim and, indeed, in any situation where the public body is providing the money. When a subcontractor submits a false billing to WBCI, the subcontractor violates the False Claims Act whenever the public body is ultimately paying the bill. But WBCI can also be liable if it knew that the subcontractor's billing is false.

"Knowingly" does not mean only active, intentional fraud, but also a reckless disregard of whether information is true or false as well as deliberate ignorance (head in the sand) of whether the information is correct. A mere negligent mistake is not, however, a knowing act.

Officers and employees who work with public contracts must therefore: (a) Verify that documents to be submitted to public bodies are accurate, complete, properly disclosed, documented and retained in the appropriate files; and (b) Require subcontractors, consultants, vendors and suppliers to comply with the laws and regulations.

A common source of false claims is false or fraudulent progress-payment requests in which a contractor bills for work that has not been performed, is defective or for costs that are unallowable. A false claim can also occur when the contract requires the use of certain materials, but the contractor uses different materials and then invoices the government for the materials specified in the contract. Even if the substituted materials are equal to or better than the specified materials, a false claim may have been committed because the government is entitled to receive exactly what it contracts for.

Violation of the False Claims Acts could be particularly damaging to the Company's business and reputation, as the public body often seeks to suspend or debar

violators from further Government contracting. Criminal prosecution of other contractors has resulted in situations that the Government viewed as particularly serious. WBCI's policy is to avoid even the appearance of violating a State or Federal False Claims Act.

### **13. ENVIRONMENTAL POLICY**

Our Company is committed to protecting human health and the environment. This commitment requires that we integrate employee health and safety and environmental consideration into all aspects of our facilities, operations and processes. It further requires that we operate in a manner that is environmentally responsible and that ensures the protection of the health and safety of our employees and the public. We make every effort to recognize and respond to community and employee concerns about these issues.

Employees are responsible for conducting their work activities in a safe and environmentally responsible manner and for bringing to management's attention any actual or potentially dangerous condition.

Particular attention should be paid to the disposal of waste materials, erosion control and discharges into the air, soil or water. Federal, state and local environmental laws and regulations govern these matters and it is essential that you become familiar with those laws and regulations as they relate to your work and that you take care to assure that the laws and regulations are followed.

No one at WBCI may participate in concealing the improper discharge, disposal or storage of hazardous materials or other pollutants. Violation of environmental laws may result in WBCI being suspended or debarred from seeking public contracts.

### **14. COMMITMENT TO DISADVANTAGED, MINORITY, AND FEMALE BUSINESS ENTERPRISES.**

WBCI is committed to using its best efforts to use qualified small, socially or economically disadvantaged business enterprises as subcontractors, suppliers and vendors in accordance with applicable government regulations, including commercially useful function requirements. All officers and employees should be familiar with and follow WBCI's DBE Policy. Any questions about this commitment or policy should be directed to either Joseph Williams, Vice-President, Operations or to Michael Williams, WBCI's DBE compliance officer.

## 15. BRIBES, KICKBACKS GRATUITIES and COLLUSION

WBCI prohibits, without exception, all forms of bribery, kickbacks and corrupt acts by its directors, officers, employees, agents and others acting on its behalf.

- a) “Corruption” is dishonest or illegal behavior, including fraud, bribery, bid-rigging or influencing an individual or entity to provide improper advantages.
- b) A “bribe” may include money, favors, gifts, entertainment or “anything of value” that is offered, promised or delivered, whether directly or indirectly, in order to influence the judgment or conduct of a person in a position of trust.
- c) The term “anything of value” is broadly defined; it includes cash, gifts, trips, lavish entertainment, certain political and charitable contributions, free merchandise or services, among other things.
- d) A “gratuity” also violates government contract laws and WBCI policy. It is an offer or a reward of anything of value to a government official for a past action “for or because of an official act.”
- e) A “kickback” is a bribe; the term is commonly used to describe bribery in construction projects. The U.S. Anti-Kickback Statute defines kickback as compensation of any kind directly or indirectly made for the purpose of influencing an award of a subcontract or prime contract.
- f) A kickback can take many different forms, from an outright payment by a subcontractor, to an offer by a subcontractor to give building materials or supplies to a purchasing agent (or sell them to the purchasing agent at below-market prices) for his or her personal use, to discounts that may be offered to WBCI for the purpose of getting favorable business considerations.
- g) The U.S. Copeland “Anti-Kickback Act” prohibits companies from inducing an employee to give up any part of the compensation to which he or she is entitled under his or her contract of employment. It applies to all contractors and subcontractors performing work on any federally funded or assisted contract, subject to federal wage standards in excess of \$2,000, for the construction, prosecution, completion or repair of any public building or public work, with limited exceptions.
- h) Section 33E-7 of the Illinois Code makes it a criminal offense to provide, or attempt to provide, or offer to provide, or solicit or accept or attempt to accept any kickback for the purpose of improperly obtaining or rewarding favorable treatment in connection with a prime contract or a subcontract relating to a prime contract. Section 33E-7 also makes it a criminal offense to include directly or indirectly the amount of any prohibited kickback in the contract price charge by a subcontractor to a prime contractor or a higher tier subcontractor or in the contract price charge by a prime contractor to any unit State government for a public contract.

(i) **Bid Collusion:** Section 50-25 of the Illinois Procurement Code makes it a Class 4 felony to offer or pay any money or other valuable thing to any person to induce him or her not to bid for a State contract or as recompense for not having bid on a State contract. That same section provides the same penalty for any person who accepts such money or valuable thing or who withholds a bid in consideration for the payment of money or other valuable thing. WBCI expects all of its officers and employees to not engage in any such collusive conduct.

(j) **Collusive Practices:** Section 50-40 of the Illinois Procurement Code requires contractors to report to the Illinois Attorney General and the chief procurement officer of the involved agency any suspected collusion or other anti-competitive practices among bidders, offers, contractors, proposers or employees of the State. WBCI expects all of its officers and employees to report any such collusion or other anti-competitive practice to WBCI's Compliance Officer so that appropriate reporting can be made.

At WBCI:

- We do not pay or offer bribes, kickbacks or gratuities to public officials, foreign public officials, building or other construction inspectors, private individuals or to any other person or organization, either directly or indirectly, including through their family members, friends, agents, charities or other intermediaries.

- We do not solicit or accept bribes, kickbacks or gratuities from any person or organization.

- We do not make, offer, promise, solicit or accept bribes through prime contractors, subcontractors, joint venture partners, disadvantaged or minority business enterprises, brokers, agents, consultants or any other Third Party.

- We do not seek or take undue benefits by taking advantage of personal relationships with public officials, foreign public officials, public agencies or any other private party.

- We do not conceal bribes or other improper payments by including them in prime or sub-contracts, by using "off-the-books" arrangements or by falsifying our books and records in any other way.

- We maintain detailed and accurate books, records and internal controls for entertainment, gifts, payments, receipts and Third-Party relationships.

- We strictly prohibit facilitation payments (small payments to expedite a routine, non-discretionary action by a public official).

## 16. COMPLIANCE AND DISCIPLINE

Violation of any of this Code will result in disciplinary action up to and including termination of employment.



# III. WBCI'S OPEN DOOR POLICY

## QUESTIONS AND REPORTING

It is WBCI's top priority and every officer and employee's obligation to uphold the policies in this Code. If you have any questions regarding the policies contained in this booklet, please contact WBCI's Compliance Officer Jacqueline Smith at 309-679-6322.

WBCI's officers and employees must report any incidents of unlawful or unethical conduct, conflicts of interest, unsafe conditions, lack of proper security for information or property, or other conduct inconsistent with WBCI policy. Reporting suspected violations of the WBCI's Ethics policy will not adversely affect your employment at WBCI (*i.e.*, employees will not be demoted, transferred, suspended, or terminated for reporting a violation).

In order to foster a comfortable reporting environment, you may report any violation or suspected violation directly in person or anonymously using any of the following reporting avenues;

- » Your supervisor or manager,
- » All levels of management,
- » Toll-free Ethics Hotline 1-844-688-0416

**Non-Retaliation Policy.** Under no circumstances will WBCI tolerate any direct or indirect retaliation against an individual who reports in good faith a suspected Code violation, even if the concern is found to be unsupported. Anyone who attempts to discourage good faith reporting or who retaliates against an individual that reports a good faith concern will be disciplined, up to and including possible termination.